

**Christopher J. Grotegut, DVM**

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**USDA-National Organic Standards Board**

Ms. Francine Torres

USDA-AMS-TMP-NOP

1400 Independence Avenue, SW.

Room 4008-So, AG Stop 0268

Washington, D.C. 20250-0200

RE: Comments on Pasture Requirements For National Organic Standards Board

**To the Honorable Members of the National Organic Standards Board:**

The following are recommendations that can help with animals' comfort, health, and the organic industry sustainability.

**Beef Cattle**

1. No more than 120 days for lifetime in planned total confinement per animal. The 120 days needs to be divided at no more than 30 days immediately post weaning, and no more than 90 days immediately before harvest.
2. Pregnant cows may be confined just prior to and immediately after calving for a period not to exceed 30 days. If the calf is removed from the cow. The cow must be place back with the herd with in three days.
3. All confined beef cattle must have access to natural light daily.
4. Cattle diagnosed with and being treated for clinical disease may be confined until resolution or removal from the herd.
5. Beef Cattle will require a minimum of 300 square feet and 1 linear foot of feed bunk space per head during the 90 days period immediately before harvest. Adequate supplies of fresh water must be made available to the cattle while in the confinement facility. The requirements for shade and shelter should be optional for location.
6. Pasture needs to be defined as the minimum area with plant growth on it that provides at least 80% of the animals total dietary dry mater intake. The exception is organic roughages (hay, green chop, silage) fed during inclement weather or occasional pasture shortages, in that instance organic roughages would constitute as pasture. The minimum area should not be less than 3 animal units (1 animal unit = 1200 pound live weight) per acre of pasture grazing production. Rotational grazing is permitted and encouraged.
7. Beef Cattle Confinement Ration needs to be defined as a ration made of 100% National Organic Program approved feed stuffs that consists of no less than 10% roughage on a dry matter basis during the final 90 days before harvest.

**Dairy Cattle**

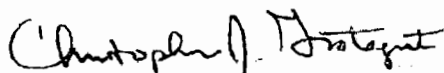
1. All Dairy cattle weighing greater than 150 kilograms (330 pounds) must have a minimum access of 2 hours outdoors for exercise daily. Exercise areas for mature cows must not be less than 300 square feet per head available daily. This can include dry lots.
2. All Dairy cattle must have visible access to natural light daily.
3. Pregnant cows may be confined just prior to and immediately after calving for a period not to exceed 30 days. Once the calf is removed the cow must move back into the regular herd within three days.
4. Pasture must be available daily for a minimum of 2 hours, with the exception of inclement weather or feed shortages. Pasture's needs to be defined as the minimum area with plant growth on it that provides at least 80% of the animal's total dietary dry matter intake. The exception is organic roughages (hay, green chop, silage) fed during inclement weather or occasional pasture shortages for a feeding period not to exceed 4 months, in that instance organic roughages would constitute as pasture. The minimum pasture area should not be less than 3 animal units (1 animal unit = 1200 pound live weight) per acre of pasture grazing production. Rotational grazing is permitted and encouraged.
5. Organic Milk Producing Dairy Cattle Rations should not constitute more than 20% concentrate type feeds, such as grain seeds and oil seeds (i.e. corn, wheat, grain sorghum, barley, oats, soybeans, peas, flax, cottonseed, and their processed by products), on a dry matter basis. Supplemental roughages such as organic hay, organic silages, and organic green chopped materials may be used to supplement pasture.
6. Use of free stall type barns are encouraged for cow comfort and must meet the requirement of at minimum 2 hours of access to pasture, or at minimum 2 hours access to exercise lots daily during periods when pasture conditions do not warrant grazing such as snow cover, or excessive mud.
7. Fresh water must be available at all times.
8. Cattle diagnosed with and being treated for clinical disease may be confined until resolution or removal from the herd.

**Poultry/Birds**

1. Birds should have access to the ground at all times.
2. During periods of inclement weather or when inclement weather is suspected birds may be placed in protective housing providing enough space to keep house litter above 60% dry matter.
3. Natural light should be made available to the birds at all times that sunlight is available.
4. Poultry rations should consist of 100% organic feeds.
5. Pasture and or dry lot areas must be made available daily for a minimum of 2 hours.
6. Fresh water must be available at all times.
7. More review of this area from a poultry expert would be advised.

Thank you, for your time and consideration of these issues.

Sincerely,



Christopher J. Grotegut, DVM